

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE  
DISTRICT OF TENNESSEE**

Dr. Regina Jordan-Sodiq,       )  
Plaintiff                               )

**Case No.: 3:25-cv-00288**  
**Judge Eli Richardson Jury Demand**

v.   )

State of Tennessee et. al.,       )  
Defendants and                               )  
Waste Management, **Defendant** )

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

**AND REQUEST FOR DISCLOSURE OF HEARING DATE & REGISTERED AGENT  
INFORMATION\*\***

**COMES NOW** Plaintiff, Dr. Regina Jordan-Sodiq, and **respectfully submits** this Opposition to Defendant's Motion to Dismiss, challenging Defendant's attempt to evade proper litigation through jurisdictional objections and procedural delays.

**I. Procedural Deficiencies**

Plaintiff states the following in support of this opposition:

1. **Failure to Notify of Hearing Date:** Defendant has filed a Motion to Dismiss but has not provided proper notification of the scheduled hearing date, **impeding Plaintiff's ability to submit a timely response.**
2. **Obstruction of Service:** Plaintiff has made **diligent efforts** to ascertain the registered agent's correct address for service; however, Defendant has failed to disclose definitive information, thereby **hindering proper legal procedure.**
3. **Lack of Transparency in Litigation:** Defendant's failure to disclose essential procedural details **constitutes undue delay**, potentially violating **principles of fairness and due process.**

**II. Defendant's Business Presence Establishes Jurisdiction**

Defendant's business operations and contractual agreements **unequivocally establish personal jurisdiction** within this venue:



1. **Ongoing Business Transactions:** Waste Connections of Tennessee, Inc. provides **commercial waste collection services** to Plaintiff and other residents within this jurisdiction (*See Exhibit A – Utility Bill*).
2. **Financial Engagement within the Forum:** Defendant directly receives payments from Plaintiff for services rendered, further reinforcing the legal nexus necessary for jurisdiction.
3. **Contradiction in Defendant's Claim:** Defendant actively conducts business operations, enters contracts, and engages in financial transactions within this state, contradicting its jurisdictional objections.

### III. Defendant's Procedural Obstruction Requires Disclosure

Defendant's actions **impede judicial efficiency** and hinder Plaintiff's ability to litigate fairly:

1. Defendant has **failed to disclose the hearing date** for its Motion to Dismiss, **obstructing Plaintiff's ability to respond effectively**.
2. Defendant's **Business Entity Disclosure lacks the registered agent's full address**, preventing proper service of process.
3. **Pattern of Harassment:** Defendant **engaged in targeted intimidation**, including **repeated anonymous calls to Plaintiff's phone immediately before or after waste pickup services**, raising concerns of **coordinated harassment**.

### IV. Defendant's Procedural Obstruction and Harassment

Defendant's actions extend beyond procedural misconduct—they demonstrate **a clear pattern of intimidation**:

1. **Coordinated Harassment:** Defendant has engaged in **repeated anonymous phone calls** to Plaintiff immediately before or after waste pickup services.
2. **Violation of Federal Stalking Laws:** Under **18 U.S. Code § 2261A**, harassment through **surveillance, unwanted communications, and intimidation** constitutes stalking, warranting legal intervention.
3. **Telephone Harassment Violations:** Repeated, anonymous calls intended to **intimidate or disrupt** may violate **state and federal laws** governing telephone harassment.
4. **Conspiracy & Coordinated Intimidation:** If multiple individuals or entities have **collaborated in targeting Plaintiff**, conspiracy laws **may apply** under statutes prohibiting **organized harassment efforts**.

### V. Relief Requested

WHEREFORE, Plaintiff **respectfully requests** this Court to:

- **Deny Defendant's Motion to Dismiss**, as jurisdiction is properly established.
- **Compel Defendant to disclose the hearing date, time, and courtroom assignment** for its pending Motion to Dismiss.
- **Require Defendant to provide the full registered agent's address** for proper service.



- **Consider Judicial Oversight of Defendant's harassment tactics.**
- **Grant any further relief this Court deems just and proper.**

## **VI. Defendant's Procedural Conduct Warrants Judicial Oversight**

Defendant's failure to disclose the hearing date and registered agent's address supports the need for judicial review:

4. Defendant has obstructed Plaintiff's ability to **effectively litigate**, raising concerns about **bad-faith procedural tactics**.
5. These actions do not justify dismissal **with prejudice**—instead, they highlight a **pattern of procedural obstruction**.
6. If dismissal were ever considered, **it should be without prejudice**, allowing Plaintiff an opportunity to **correct technical concerns**.

## **VII. I Relief Requested**

Plaintiff respectfully requests this Court to:

- **Deny Defendant's Motion to Dismiss with prejudice**, as procedural concerns **do not warrant permanent dismissal**.
- **Uphold Plaintiff's right** to amend or correct any procedural issues rather than barring litigation.
- **Grant any further relief this Court deems just and equitable.**

## **CERTIFICATE OF SERVICE**

I hereby certify that on this **5th day of May, 2025**, a true and correct copy of **Plaintiff's Response in Opposition to Defendants' Motion to Dismiss and Motion to Compel Disclosure of Hearing Date and Registered Agent Information**, along with accompanying exhibits, was served via **electronic filing** upon the following:

**Defendants' Counsel:** Baker, Donelson, Bearman, Caldwell & Berkowitz, PC and Megison M. Hancock at email: [mhancock@bakerdonelson.com](mailto:mhancock@bakerdonelson.com)

Pursuant to the Tennessee Rules of Civil Procedure, electronic service of this filing is deemed proper and effective.

**Submitted this 5th day of May, 2025**

**Dr. Regina Jordan-Sodiq, Pro Se Plaintiff**  
1757 Autumnwood Blvd Clarksville, TN 37042



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

<sup>DR</sup>  
Regina Jordan-Sadig  
Plaintiff(s),

Case Number 3:25-CV-00288

v.

Judge Judge Eli Richardson  
Jury Demand -

State of Tennessee et.al.,  
Defendant(s).

Magistrate Judge \_\_\_\_\_

and Waste Management, Defendant

Plaintiff's Opposition to Defendant's Motion  
(Type of Pleading) to Dismiss

① Exhibits: Exhibit A is the Utility bill  
exhibit A-1 and exhibit A-2

①



CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)

Response to Motion to Dismiss

(Name)  
(Address)  
(Address)

Kimberly S. Seirs  
214 Church Street  
Suite 300, Nashville TN 37203

(Name)  
(Address)  
(Address)

Katherine R. Rogers  
222 Second Ave South, Suite 2000  
Nashville TN 37203

(Name)  
(Address)  
(Address)

Stanley W. Howell  
309 E 2nd St  
Clarksville TN 37040

(Name)  
(Address)  
(Address)

Vason W. Dutton  
701 Gates LLP  
201 Commerce Street  
Suite 1500, Nashville TN 37203

(Name)  
(Address)  
(Address)

Tracey R. Knight  
208 S 2nd Street  
Clarksville TN 37040

(Name)  
(Address)  
(Address)

Christopher Murphy  
Bulfinch Square Bldg  
1320 Adams St, Suite 1400  
Nashville TN 37203

(Name)  
(Address)  
(Address)

Kirkwood Mason  
600 Peachtree Street, NE, Suite 300  
Atlanta GA 30308

(Name)  
(Address)  
(Address)

John H. Dollarhide  
Darius Snow LLC  
1500 2nd Avenue South Suite 1600  
Nashville TN 37203

(Name)  
(Address)  
(Address)

Colie William Schott  
2112 West End Ave, Suite 1100  
Nashville TN 37203

on the day of

24

Continue -

Signature

2



CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)  
has been served on:

Response to Motion to  
Dismiss

(Name)

IN. Scott Sims

(Address)

3102 West End Avenue, Suite 1100

(Address)

Nashville TN 37203

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

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(Address)

(Address)

(Address)

(Address)

(Address)

5th day of May

2025  
Signature [Signature]



DR  


(Signature)

REGINA Jordan Sedig

(Print Name)

1757 Autumnwood Blvd

Clarksville TN 37042

(931) 561-2546

(Address & Telephone Number, if any)





QUEEN CITY DISPOSAL  
A WASTE CONNECTIONS COMPANY  
50 N REYNOLDS ST  
CLARKSVILLE TN 37040-6329  
DISTRICT NO. 6034

REGINA JORDAN  
1757 AUTUMNWOOD BLVD  
CLARKSVILLE TN 37042

*Exhibit A1*

ACCOUNT NO.  
INVOICE NO.  
STATEMENT DATE  
DUE DATE  
BILLING PERIOD

6034-511047  
6285329W034  
03/17/25  
04/05/25  
04/01/25 - 06/30/25

FOR ASSISTANCE  
One Time Payments  
Customer Service

800-457-1375  
931-552-3010

## INVOICE STATEMENT

Date	Description	Amount
	<b>Service Location</b>	
	<b>Acct #511047</b>	
04/01/25	RI 98 GI 1X Wk 1	
	04/01/25-06/30/25	
	Fuel & Material Surcharge	
	<b>Current Charges And Fees</b>	
	<b>Total Due</b>	
	Regina Jordan 1757 Autumnwood Blvd 1 Each @ \$78.06	\$ 78.06
		\$ 4.99
		\$ 83.05
		\$ 83.05

This invoice is scheduled for automatic payment according to your instructions on our online bill pay portal at [myaccount.wcicustomer.com](http://myaccount.wcicustomer.com).

\*\*\* Attention all Customers! \*\*\*

If you are trying to reach our customer service, please note that our phone number has changed. For customer service please call our main number 931-552-3010.

Payments must be received on the 5th of each month to avoid late fees and service interruptions.

Holidays: New Year's Day, Memorial Day, 4th of July, Labor Day, Thanksgiving Day, and Christmas Day.  
Your waste disposal will be removed one day later on any of the above listed holidays.

Please place your trash container curbside the night before your scheduled pick up day with a minimum of 5 feet from any stationary object.

Please remit to the address below and return your remit stub with your payment.



QUEEN CITY DISPOSAL  
A WASTE CONNECTIONS COMPANY  
50 N REYNOLDS ST  
CLARKSVILLE TN 37040-6329

AV 01 087179 96076H216 A\*\*5DGT



REGINA JORDAN  
1757 AUTUMNWOOD BLVD  
CLARKSVILLE TN 37042-1713

ACCOUNT NO. 6034-511047  
INVOICE NO. 6285329W034  
STATEMENT DATE 03/17/25  
DUE DATE 04/05/25

Do Not Pay - Auto Pay Enabled

WRITE IN  
AMOUNT  
PAID

\$



TO CHANGE ADDRESS

Check here and complete the information on the reverse side.

MAIL PAYMENT TO:  
QUEEN CITY DISPOSAL  
A WASTE CONNECTIONS COMPANY  
PO BOX 535233  
PITTSBURGH PA 15253-5233



6034 00000000000000000000X5110471 0000000830500000000000006285329 2



Queen City Disposal - Scheduled Automatic Payment  
From:olp6034@wcnx.org  
To:g4818@yahoo.com  
Date:Wednesday, March 19, 2025 at 07:42 AM CDT

Exhibit A 2

## Message Body



WASTE CONNECTIONS

Hello regina JORDAN,

Your Automatic Payment for account 6034-511047 has been scheduled.

Payment Date: 03/19/2025

Payment Amount: \$83.05

Payment Account: \*\*\*\*\*1695

If you would like to view your invoices, please log in to [My Account Portal](#).

If you have any questions or concerns, please call us at 931-552-3010.

We appreciate the opportunity to manage your waste disposal needs.

Sincerely,  
Queen City Disposal Customer Care Team

Automatic  
Payment

archive